



United States Department of the Interior

NATIONAL PARK SERVICE
Fire Management Program Center
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Boise, Idaho 83705-5354

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Y14(NIFC)

October 3, 2000

Memorandum

To: Regional Fire Management Officers

From: National Fire Management Officer

Subject: Prescribed Fire Exemptions

The Fire Management Program Center is beginning to receive requests for exemptions to execute prescribed burns west of the 100th meridian for the fall, winter, and spring seasons. Because of the disparate nature of these requests we see this as an appropriate time to reiterate the criteria and process for granting exemptions so we have equal understanding among the fire management community.

The Exemption Criteria (Attachment 3) from the Director's Memo of June 15th, 2000 is included for reference to address the issues of high priority mitigation actions in very low-risk areas. As we review the four identified criteria for high priority and four variables to assess risk we will evaluate the responses within the following three contexts:

- 1) Why do we have to do it now?
- 2) What are the consequences of not doing it now?
- 3) What are the consequences of failure?

Each request for an exemption must include: responses to the three questions above, responses to the high priority mitigation actions and variable to assess risk, the burn plan, and a complexity rating and risk assessment. We need to be honest in our assessments and we need to provide convincing evidence that we are following the Secretaries' intent for the prescribed fire moratorium. The Regional Office must review the request and if they concur and want to recommend the project, it should be forwarded to the Fire Management Program Center for review and approval.

Any prescribed burn that is approved for an exemption will require that contingency resources identified in the plan be included as part of the holding forces and be onsite. This constraint will remain in effect until such time as the program is fully operational.

If you have any questions, please contact Sue Vap at the Fire Management Program Center at 208/387-5225.

Attachment 3:

EXEMPTION CRITERIA

Based on the suspension of prescribed fire west of the 100th meridian, the following discussion provides guidance for NPS prescribed fire approval and implementation, and defines what is meant by “high priority mitigation actions in very low-risk areas.” Exceptions to this suspension may be granted but only after review of the Prescribed Fire Plan by the National Office staff at the Fire Management Program Center. The Prescribed Fire Plan must fully meet the requirements listed below.

NPS Units East of the 100th Meridian.

The standard NPS process for prescribed fire approval and implementation will remain in effect. All proposed prescribed fires will be planned and implemented in strict adherence with NPS policy.

NPS Units West of the 100th Meridian.

All prescribed fires in NPS units west of the 100th meridian are suspended beginning May 12, 2000 and continuing until further notice. Certain exceptions may be granted with national-level approval to address high priority mitigation efforts in very low-risk areas.

High priority mitigation actions include resource management and hazardous fuel reduction activities defined as those that meet all the following criteria:

- ❑ The action can only be completed infrequently due to the specific nature of the conditions required for accomplishment (i.e., suitable conditions only occur very infrequently and lack of implementation now will cause indefinite or long-term deferral of the action),
- ❑ There is an identified high level of need for this action,
- ❑ The potential long-term benefits are very high,
- ❑ The probability of a successful prescribed fire is high as determined through an approved assessment.

Very Low Risk is defined as the relative risk of the prescribed fire as determined through an assessment of the following four variables:

- ❑ Running 5-day mean of a selected fire danger level using a National Fire Danger Rating System (NFDRS) index or component, or Canadian Forest Fire Danger Rating System output, or other nationally accepted drought indicator,

Attachment 3 (cont.)

- ❑ Potential assessment which provides a description of the relative seasonal severity for each geographic area of the United States,
- ❑ Level of fire activity in geographic areas surrounding the location of the proposed prescribed fire and on a national level as appropriate, this level will be indicated by the National Preparedness Levels,
- ❑ Complexity of the specific prescribed fire as determined through completion of the Wildland and Prescribed Fire Complexity Rating Worksheet.

Requesting Unit Responsibilities:

Those units seeking an exception must submit to their respective Regional Office, a completed Prescribed Fire Plan, Wildland and Prescribed Fire Complexity Rating Worksheet, current 5-day running mean for the appropriate fire danger indicator, and written justification defining why this particular prescribed fire constitutes high priority. Regional Offices will evaluate the proposal to determine if it meets criteria as a candidate for exception. If the proposal represents a viable candidate for exception, the Regional Office will forward it to the Fire Management Program Center for final determination.

National Office Responsibilities:

FMPC staff will review the plan to evaluate the objectives, prescription, planned implementation actions, and contingency actions, and will review the complexity rating. Staff will also assess the current fire danger indicator(s), review the Potential Assessment produced at the National Interagency Fire Center (NIFC), and review the justification.

From this information, staff members will evaluate two sets of criteria to determine applicability for exception. These criteria include an assessment of the priority of the proposed actions and of the risk of the prescribed fire. Prescribed fire proposals that do not meet the criteria of high priority and low risk will not be approved.

Priority will be assessed by evaluating the written justification from the requesting office against the defined criteria listed above.

The process the national offices will use to assess risk is described in the following section and following chart (Figure 2). This chart incorporates the four variables of current fire danger levels, potential assessment, level of fire activity, and complexity to produce a relative risk rating. To use this chart, lines will be drawn to connect the top and bottom variables and the left and right variables. Where the lines cross will be the indicator of the relative risk of the prescribed fire.

During the temporary suspension period beginning May 12, 2000, only those prescribed fires that have a level of risk that falls in the Very Low area at the lower right corner of the chart will be considered for exception.

Attachment 3 (cont.)

Values for each variable are determined as follows:

Potential Assessment: Available from the National Interagency Coordination Center in Boise.

Level of Fire Activity: Corresponds to the National Preparedness Level (PL). Low = PL I, II or III; Moderate = PL IV; High = PL V.

Complexity: Determined from the complexity rating worksheet that accompanies each Prescribed Fire Plan (Figure 3).

Current Fire Danger Level: Adjective rating of the running 5-day mean of appropriate fire danger indicator provided by the requesting unit through analysis of their local fire weather station.

Approval or disapproval will be provided in writing to the Agency Administrator at the administrative unit requesting the exception. This decision will show both priority and risk (Figure 4).

Attachment 3 (cont.)

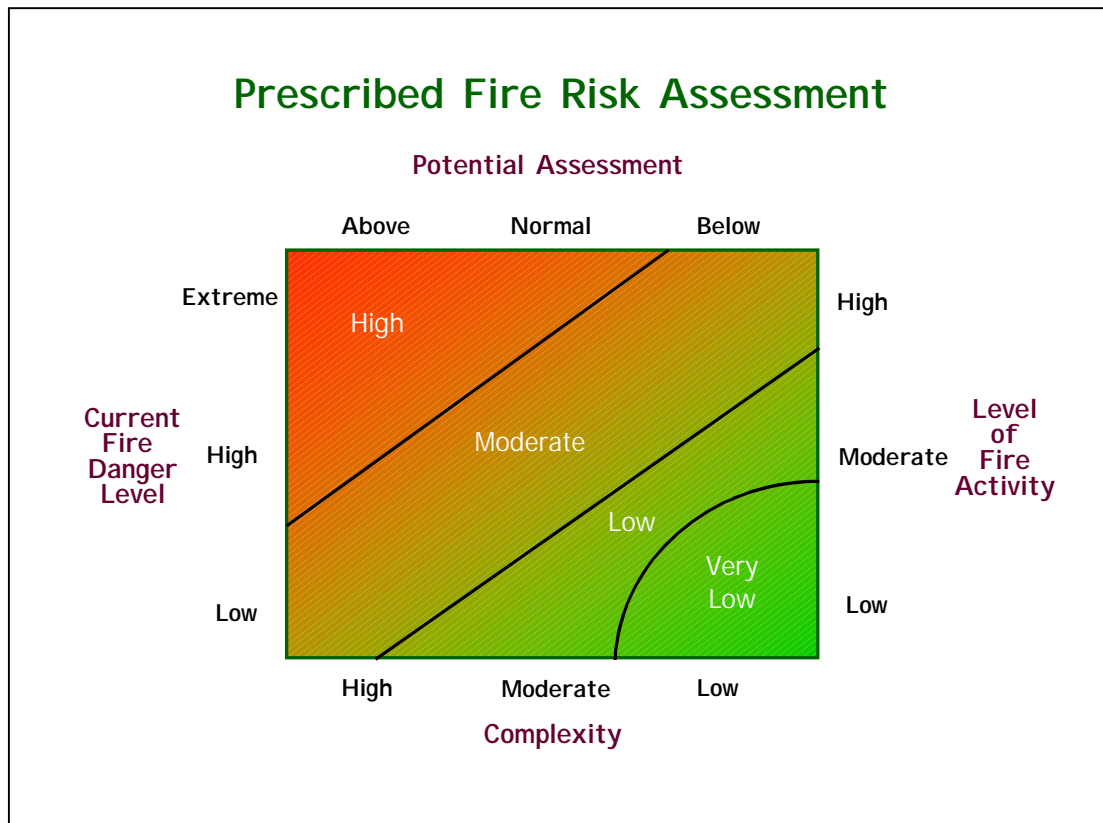


Figure 2. Prescribed fire risk assessment chart.

A copy of the Wildland and Prescribed Fire Complexity Rating Worksheet is attached as Figure 3.

Attachment 3 (cont.)

WILDLAND AND PRESCRIBED FIRE COMPLEXITY RATING WORKSHEET

<i>Complexity element</i>	<i>Weighting factor</i>	<i>Complexity value</i>	<i>Total points</i>
Safety	5		
Threats to boundaries	5		
Fuels and fire behavior	5		
Objectives	4		
Management organization	4		
Improvements	3		
Natural, cultural, social values	3		
Air quality values	3		
Logistics	3		
Political concerns	2		
Tactical operations	2		
Interagency coordination	1		

Overall complexity points

Complexity Rating (circle)

L

M

H

Complexity Value Breakpoints:

<i>Low</i>	<i>40 - 90</i>
<i>Moderate</i>	<i>91 - 140</i>
<i>High</i>	<i>141 - 200</i>

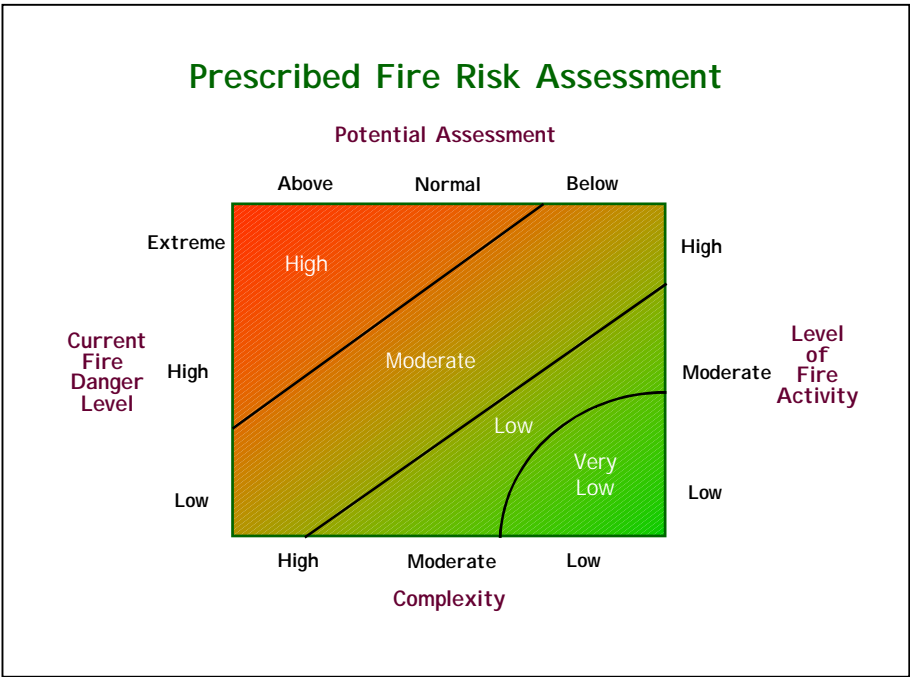
The Wildland and Prescribed Fire Complexity Analysis provides a method to assess the complexity of both wildland and prescribed fires. The analysis incorporates an assigned numeric rating complexity value for specific complexity elements that are weighted in their contribution to overall complexity. To use the worksheet, assign a Complexity Value ranging from 1 (low) to 5 (high) for each Complexity Element. Complete the total points column by multiplying the Weighting Factor by the Complexity Value. Add the values in the Total Points column to arrive at the value for the Overall Complexity Points. Compare the Overall Complexity Points with the Complexity Value Breakpoints shown above to determine the Complexity Rating.

Figure 3. Wildland and prescribed fire complexity rating worksheet.

Attachment 3 (cont.)

DOCUMENTATION OF APPROVAL OR DISAPPROVAL OF REQUESTS FOR AN
EXCEPTION FOR PRESCRIBED FIRE IMPLEMENTATION.

<i>Priority Element</i>	<i>Yes</i>	<i>No</i>
Can the action only be completed infrequently due to the specific nature of the conditions required for accomplishment (i.e., suitable conditions only occur very infrequently and lack of implementation now will cause indefinite or long-term deferral of the action)?		
Is there is an identified high level of need for this action?		
Are the potential long-term benefits very high?		
Is the probability of success high as determined through an approved assessment?		



Determination for Exception	Prescribed Fire is approved as an exception and can be implemented at this time	
	Prescribed Fire is not approved as an exception and will not be implemented at this time	

Reviewed by _____ Date _____

Approved by _____ Date _____

Figure 4. Documentation of approval or disapproval of request for exception for prescribed fire implementation (will be returned to Agency Administrator by approving office).